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10 **UNITED STATES DISTRICT COURT**
11
12 **DISTRICT OF NEVADA**

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14 LEVY AD GROUP, INC., a Nevada)
15 corporation; LEVY PRODUCTION GROUP,) Case No.: 2:20-cv-763
16 LLC, a Nevada limited liability company;)
17 LEVY ONLINE, a Nevada limited liability)
18 company,)
19 Plaintiffs,)
20 -vs-)
21 THE CHUBB CORPORATION dba CHUBB)
22 GROUP OF INSURANCE COMPANIES, a)
23 New Jersey corporation; FEDERAL)
24 INSURANCE COMPANY, an Indiana)
25 corporation,)
26 Defendants.)
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**STIPULATION AND
ORDER TO EXTEND TIME BY 14
DAYS FOR PLAINTIFFS TO FILE
RESPONSE IN OPPOSITION TO
DEFENDANT FEDERAL'S MOTION
TO DISMISS PURSUANT TO RULE
12(b)(6)**

(First Request)

20 IT IS HEREBY STIPULATED AND AGREED by Plaintiffs Levy Ad Group, Levy
21 Production Group, LLC, and Levy Online (“Levy Entities”), and Defendant Federal Insurance
22 Company (“Defendant”), by and through counsel and subject to the Court’s approval, that the
23 time for Plaintiffs to file and serve their Response in Opposition to Defendant Federal Insurance
24 Company’s Motion to Dismiss Complaint be extended by fourteen (14) days through and
25 including July 9, 2020.

26 Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rule IA 6-1(a), Plaintiffs represent that
27 the additional time is needed for Plaintiffs to meaningfully respond to Defendant Federal’s
28 motion because of Plaintiffs’ counsel’s scheduling conflicts. Specifically, prior to the June 25,

1 2020 (the date on which a response would be due absent the proposed stipulated extension),
2 Plaintiffs' counsel must prepare for and participate in two medical-legal screening panel
3 proceedings in medical negligence cases in Idaho and prepare a Final Joint Pretrial Memorandum
4 and all pretrial motions in a federal court action in Wyoming, in addition to other day-to-day
5 matters. Because of the ongoing COVID-19 pandemic and related government directives,
6 completion of these tasks is complicated and delayed by the limited availability of administrative
7 staff.

8 For these reasons, the parties stipulate and agree, subject to the Court's approval, to allow
9 Plaintiffs through and including July 9, 2020 to file its response in opposition to Defendant
10 Federal's motion. The parties respectfully request the Court enter an Order accordingly.

11 DATED: June 13, 2020

DATED: June 13, 2020

12 LAW OFFICE OF BRADLEY L. BOOKE

FORAN GLENNON PALANDECH PONZI
& RUDLOFF PC

14 By: /s/ Bradley L. Boone

By: /s/ Amy M. Samberg

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Attorneys for Defendants

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IT IS SO ORDERED:

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23 UNITED STATES DISTRICT JUDGE,
24 Dated: June 15, 2020.

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